

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY,

Plaintiff,

v.

HARMAN INTERNATIONAL  
INDUSTRIES, INCORPORATED,  
A Delaware Corporation,

Defendant.

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Case No. 05-10990 DPW  
Magistrate Judge Judith G. Dein

**ASSENTED-TO MOTION TO FILE UNDER SEAL THE UNREDACTED REPLY  
MEMORANDUM OF LAW, THE UNREDACTED RESPONSE AND REPLY  
STATEMENTS OF FACT, AND EXHIBITS 30 THROUGH 40 TO HARMAN'S  
MOTION FOR SUMMARY JUDGMENT OF UNENFORCEABILITY DUE TO  
MIT'S INEQUITABLE CONDUCT**

Defendant Harman International Industries, Inc. ("Harman") hereby moves to file under seal until conclusion of this case, pursuant to the Parties' Stipulated Protective Order entered by the Court in this case, the full versions of the Reply Memorandum of Law and Response and Reply Statements of Fact in support of Harman's Motion for Summary Judgment of Unenforceability Due to MIT's Inequitable Conduct. Redacted versions of these documents will be filed electronically and publicly with the Court. Harman requests that the full, unredacted versions be sealed until the conclusion of this case.

Harman further seeks to seal until the conclusion of the case Exhibits 30 through 40 to Harman's Motion for Summary Judgment of Unenforceability Due to MIT's Inequitable Conduct.

This Motion is necessary to comply with the protections of the Stipulated Protective Order.

WHEREFORE, Harman respectfully requests that the Court enter an Order permitting Harman to file under seal the unredacted version of the Reply Memorandum of Law, the unredacted version of the Response and Reply Statements of Fact, and Exhibits 30 through 40 in support of Harman's Motion for Summary Judgment of Unenforceability Due to MIT's Inequitable Conduct.

**Certificate of Compliance with Local Rule 7.1**

Harman, by and through its attorneys, hereby certifies that it conferred with MIT's counsel on June 29, 2007, and counsel for MIT has assented to this motion.

Dated: June 29, 2007

Respectfully submitted,

/s/ Courtney A. Clark  
Robert J. Muldoon, Jr., BBO# 359480  
Courtney A. Clark, BBO# 651381  
**SHERIN AND LODGEN, LLP**  
101 Federal Street  
Boston, MA 02110  
(617) 646-2000 (phone)  
(617) 646-2222 (fax)

William A. Streff Jr., P.C.  
Craig D. Leavell  
Michelle A. H. Francis  
Jamal M. Edwards  
Colleen Garlington  
Joanna Belle Gunderson  
**KIRKLAND & ELLIS LLP**  
200 East Randolph Drive  
Chicago, IL 60601  
(312) 861-2000 (phone)  
(312) 861-2200 (fax)  
*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on June 29, 2007.

/s/ Courtney A. Clark

Courtney A. Clark